

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Deborah Harris,)
Plaintiff,)
v.) No:
Accounts Receivable Management, Inc., a)
New Jersey Corporation; and Unknown)
Debt Collectors, Individually, and as)
Agents, Apparent Agents, Servants, and/or)
Employees of Accounts Receivable)
Management, Inc.,) JURY DEMANDED
Defendants.)

COMPLAINT AT LAW

NOW COMES Plaintiff, Deborah Harris, by her Attorneys, Robert J. Semrad & Associates, L.L.C., and pursuant to this Complaint at Law, states the following against the above named **Defendants**, to wit **Accounts Receivable Management, Inc.**, a New Jersey Corporation; and **Unknown Debt Collectors**, Individually, and as Agents, Apparent Agents, Servants, and/or Employees of **Accounts Receivable Management, Inc.**.

JURISDICTION

1. The jurisdiction of the court is invoked pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. ("FDCPA"). Venue is proper as the actions that give rise to this complaint occurred, **Plaintiff** resides, and **Defendants** conduct business within this District.

PARTIES

2. **Plaintiff** is a citizen of the County of Cook, State of Illinois, and United States of America, and is a “consumer” as that term is defined by 15 U.S.C. § 1692(a)(3).
3. **Defendant, Accounts Receivable Management, Inc.**, (hereinafter “ARM”) is a New Jersey Corporation conducting business in the County of Cook, State of Illinois, and United States of America and is a “debt collector” as that term is defined by 15 U.S.C. § 1692(a)(6).
4. **Defendants, Unknown Debt Collectors**, are natural persons conducting business in the County of Cook, State of Illinois, and United States of America and each is a “debt collector” as that term is defined by 15 U.S.C. § 1692(a)(6).
5. At all relevant times, **Unknown Debt Collectors** were the agents, apparent agents, servants, and/or employees of **ARM**, and were acting in the course and scope of their agency, servitude and/or employment.

FACTUAL ALLEGATIONS

6. Prior to 2009, **Plaintiff** incurred a consumer credit card debt.
7. This debt was for personal use.
8. This debt was a “debt” as that term is defined by 15 U.S.C. § 1692(a)(5).
9. In 2009, **Unknown Debt Collectors** began calling **Plaintiff** and attempted to collect said debt.
10. Some of said telephone calls were made by **Unknown Debt Collectors** before 8:00 a.m and after 9:00 p.m.
11. During some of said telephone calls, **Unknown Debt Collectors** would threaten to ruin **Plaintiff’s** credit if she did not pay said debt.
12. During some of said telephone calls, **Unknown Debt Collectors** would threaten to sue **Plaintiff** if she did not pay said debt.
13. Upon information and belief, **Unknown Debt Collectors** did not have the present right nor intention to sue **Plaintiff**.

14. Some of said telephone calls were made by **Unknown Debt Collectors** to **Plaintiff's** roommates.
15. During said telephone calls to **Plaintiff's** roommates, **Unknown Debt Collectors** would disclose that **Plaintiff** owed a debt that they were trying to collect.
16. Said conduct by **Unknown Debt Collectors** continued throughout 2009.
17. The aforementioned telephone calls from **Unknown Debt Collectors**, to **Plaintiff**, were collection communications in violation of provisions of the FDCPA, as aforesaid.
18. As a direct and proximate result of the aforementioned actions, **Plaintiff** suffered injuries of a personal and pecuniary nature including, but not limited to: exacerbation of pre-existing medical conditions, anxiety, embarrassment, and emotional and physical harm.
19. As a result of **Defendants'** violations of the FDCPA, **Plaintiff** is entitled to actual damages pursuant to 15 U.S.C. § 1692(k)(a)(1); statutory damages in an amount up to \$1,000.00 per incident pursuant to 15 U.S.C. § 1692(k)(a)(2)(A); and reasonable attorney's fees and costs pursuant to 15 U.S.C. § 1692(k)(a)(3) from **Defendants**.

WHEREFORE, Plaintiff prays that judgment be entered

- against **Defendant, ARM, and Defendants, Unknown Debt Collectors**, Individually, and as agents, apparent agents, servants, and/or employees of **ARM**, and each of them, and in favor of **Plaintiff**, for an award of actual damages pursuant to 15 U.S.C. § 1692(k)(a)(1);
- against **Defendant, ARM, and Defendants, Unknown Debt Collectors**, Individually, and as agents, apparent agents, servants, and/or employees of **ARM**, and each of them, and in favor of **Plaintiff**, for an award of statutory damages of \$1,000.00 pursuant to 15 U.S.C. § 1692(k)(a)(2)(A);
- against **Defendant, ARM, and Defendants, Unknown Debt Collectors**, Individually, and as agents, apparent agents, servants, and/or employees of **ARM**,

and each of them, and in favor of **Plaintiff**, for an award of costs of litigation and reasonable attorney's fees pursuant to 15 U.S.C. § 1692(k)(a)(3); and;

- for any other such further relief as may be just and proper.

Respectfully Submitted,

/s/ Abbas Merchant

Abbas Merchant

ARDC 6281540

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